To: Worstell, Aaron[Worstell.Aaron@epa.gov]; Kordzi, Joe[Kordzi.Joe@epa.gov]

From: Fallon, Gail

**Sent:** Thur 11/3/2016 11:58:06 PM

Subject: FW: Western Coal EGU BART Summary (v3) 2 24 14.xlsx

Western Coal EGU BART Summary (v3) 2 24 14.xlsx

Table 3-19 from v 5 13 master doc, R8 states only, rev 5, 10-5-15.docx

**Aaron** – Could you please look at this for Joe? I'll also forward you a voicemail from him with phone numbers. I've attached a table I put together awhile back for reference but I suspect you may have made some updates. Also, here's an excerpt from our WY legal brief I refer to as a reminder of what's litigated/stayed for that action (I think my note in the table for DJ3 being litigated is wrong):

Wyoming's NOx BART determinations for only six units at three facilities are at issue in this case.

The determinations at issue are: (1) an emission limit of 0.26 lb/MMBtu<sub>7</sub> (30-day rolling average) for PacifiCorp's Naughton Units 1-2; (2) an emission

limit of 0.21 lb/MMBtu (30-day rolling average) for Basin Electric's Laramie River Units 1-3; and (3) an emission limit of 0.23 lb/MMBtu (30-day rolling average) for PacifiCorp's Wyodak Unit 1, all of which are consistent with the

installation of a control called low-NOx burners plus overfire air ("LNB/OFA").

See JA \_\_\_, Wyoming RH SIP at 94, 111-12.

**Joe** – I'm doing another management detail and not much involved in regional haze for the next year or so. I did a <u>quick</u> check of R8 actions on your spreadsheet (as I'm not sure if Aaron's working tomorrow). These are my comments:

WY: Laramie River, Naughton 1&2, and Wyodak are being litigated and are currently stayed. Naughton 3 was not litigated but will likely be gas conversion or possibly shut down. Jim Bridger was not litigated however costs in your spreadsheet appear to be incremental cost effectiveness (Aaron should check or refer to 79 FR 5041, Jan 30, 2014).

ND: Coal Creek was litigated and remanded. Stanton (PRB) cost effectiveness should be \$3,778/ton vis benefit is something less than 1.110 (state only modeled for lignite)

MT: Colstrip was litigated and remanded; these units are now scheduled to shut down. Corette was litigated and remanded and has already been shut down.

CO: Craig 1 now scheduled to shut down. SIP revision pending.

UT: Not on your sheet. Our FIP for SCR at Hunter and Huntington was finalized but costs are under \$3,000/ton. See 81 FR 43903, Jul 5, 2016.

Everything else appears accurate.

Thanks!

From: Kordzi, Joe

Sent: Thursday, November 03, 2016 1:45 PM

To: Fallon, Gail <fallon.gail@epa.gov>

Subject: Western Coal EGU BART Summary (v3) 2 24 14.xlsx

Hi Gail,

Would you pls take a look at the attached spreadsheet and let me know if the \$/ton and visibility numbers are reliable, if they are final decision numbers, if they were litigated, and what the final disposition on the controls is?